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Attorneys for Defendants SOL HEALTHCARE, LLC;  
SOLNUS TWO, LLC; SOLNUS THREE, LLC;  
SOLNUS FOUR, LLC; SOLNUS EIGHT, LLC; SOL  
MAJER; and SHLOMO RECHNITZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SERVICE EMPLOYEES INTERNATIONAL )  
UNION NATIONAL INDUSTRY PENSION )  
FUND; STEPHEN ABRECHT, Trustee, ROD )  
BASHIR, Trustee; KEVIN J. DOYLE, Trustee; )  
MYRIAM ESCAMILLA, Trustee; STEVEN W. )  
FORD, Trustee; EDWARD J. MANKO, )  
Trustee; FRANK A. MAXSON, Trustee; JOHN )  
J SHERIDAN, Trustee; LARRY T. SMITH, )  
Trustee; DAVID STILWELL, Trustee, )

Plaintiff,

vs.

EMPLOYEE EQUITY ADMINISTRATION, )  
INC., a California corporation, d/b/a Westline )  
Medical Management, et al. )

Defendants.

Case No.: CV 12 4494 JST

**JOINT STIPULATION TO CONTINUE  
CASE MANAGEMENT  
CONFERENCE; and [PROPOSED] ORDER**

Date: September 4, 2013  
Time: 2:00 p.m.  
Judge: Hon. Jon S. Tigar  
Location: Courtroom 9, 19<sup>th</sup> Floor

450 Golden Gate Ave.  
San Francisco, California

**First Amended  
Complaint filed: May 16, 2013  
Trial Date: June 30, 2014**

1 Plaintiffs Service Employees International Union National Industry Pension Fund, Stephen  
 2 Abrecht, Rod Bashir, Kevin J. Doyle, Myriam Escamilla, Steven W. Ford, Edward J. Manko, Frank A.  
 3 Maxson, John J. Sheridan, Larry T. Smith, and David Stillwell (collectively, the “Plaintiffs”), the  
 4 Westline Defendants (which includes Defendants Employee Equity Administration, Inc., Oak Facility,  
 5 Inc., RCC Facility, Inc., RV Facility, Inc., SP Facility, Inc., SJ Facility, Inc., Pleasant View  
 6 Convalescent Hospital, Inc., Willow Street Properties, LLC, Northgate Center, Inc., Jaline, Inc., Skilled  
 7 Logic Systems, Jack Easterday, and Deline Davis), and the Solnus Defendants (which include Sol  
 8 Healthcare, LLC, SOLNUS TWO, LLC, SOLNUS THREE, LLC, SOLNUS FOUR, LLC, SOLNUS  
 9 EIGHT, LLC, Sol Majer, and Shlomo Rechnitz), (collectively, the “Parties”), hereby stipulate as  
 10 follows:

11 1. A Case Management Conference is currently scheduled for September 4, 2013, pursuant  
 12 to Docket No. 46.

13 2. This Court previously ordered Mediation to occur pursuant to Docket No. 38. Such  
 14 Mediation is scheduled to occur on September 25, 2013, at this Court’s ADR Unit in San Francisco,  
 15 California. The Parties believe that it would be more efficient and cost effective to conduct the initial  
 16 Case Management Conference with Judge Tigar after the Mediation occurs.

17 3. The Parties jointly request that the Case Management Conference be continued to the next  
 18 available date for the Parties after the Mediation, which is October 9, 2013, or as soon thereafter (except  
 19 for October 16, October 23, or October 30, when the parties are unavailable) when this Court is next  
 20 available. Please note that the parties are also not available on October 3, 2013.

21 4. The Parties request that the Joint Case Management Conference Statement be submitted to  
 22 the Court ten court days before the new Case Management Conference date.

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Date: August 21, 2013

Date: August 21, 2013

JACKSON LEWIS LLP

By:                     /S/                    

DAVID R. JOHANSON

Attorneys for Defendants Sol Healthcare LLC,  
Solnus Two, LLC; Solnus Three, LLC;  
Solnus Four, LLC; Solnus Eight, LLC; Sol Majer; and  
Shlomo Rechnitz

Date: August 21, 2013

SALTZMAN & JOHNSON LAW CORPORATION

By:                     /S/                    

Kimberly A. Hancock

Attorneys for Plaintiffs

Date: August 21, 2013

By:           /S/          

SHELLEY R. BUCHANAN

Attorneys for Defendants Employee Equity  
Administration, Inc., et al.

**[PROPOSED] ORDER**

The terms of the Stipulation herein above are hereby approved and adopted.

The Case Management Conference currently scheduled for September 4, 2013, is hereby continued to ~~October 9, 2013~~ November 6, 2013, at 2:00 p.m. The Parties shall file with this Court a Joint Statement ten (10) court days prior to that date. IT IS SO ORDERED.

August 22, 2013

  
District Court Judge John S. Tigar